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APPLICATION GRANTED  
SO ORDERED   
VERNON S. BRODERICK  
U.S.D.J. 3/28/23

March 27, 2023

**Via ECF**

Hon. Vernon S. Broderick  
Thurgood Marshall United States Courthouse  
40 Foley Square, Room 415  
New York, NY 10007

Re: *Mbadiwe, et al. v. Amazon.com Inc.*, Case No. 1:22-cv-09542: Joint  
Request to Enlarge Page Limits for Forthcoming Motion to Dismiss

Dear Judge Broderick:

In accordance with the Court's Order, entered on February 2, 2023, the deadline for Defendant Amazon.com, Inc. ("Amazon") to answer or otherwise respond to the First Amended Complaint is April 12, 2023. Pursuant to Rule 4(B) of the Court's Individual Rules & Practices in Civil Cases, Amazon respectfully requests an enlargement of page limits for the briefing on its forthcoming motion to dismiss. Plaintiffs consent to this request.

The First Amended Complaint contains 31 counts under the laws of 29 different states. Amazon intends to move for dismissal on all 31 counts. Due to the large number of relevant statutory provisions and corresponding caselaw at issue, it will be challenging for the parties to sufficiently address the relevant arguments within the current page limit of 25 pages for memoranda of law in support of and in opposition to motions and 10 pages for reply memoranda.

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Accordingly, after meeting and conferring on this issue, Amazon and the Plaintiffs both agree an enlargement is necessary. With Plaintiffs' consent, Amazon proposes the following page limits for the memoranda of law to be filed in connection with Amazon's forthcoming motion to dismiss:

- Amazon's Motion to Dismiss: 40 pages
- Plaintiffs' Opposition Brief: 40 pages
- Amazon's Reply Brief: 20 pages

The proposed modest enlargements are to enable the parties to adequately and sufficiently brief the relevant arguments.

The parties appreciate the Court's consideration of this request.

Respectfully submitted,

/s/Karen L. Dunn

Karen L. Dunn

Counsel for Defendant Amazon.com, Inc.

cc: All counsel of record (via ECF)